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Fighting for Employee Justice



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January 30, 2025

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Court Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Turner v. Shop Untitled NYC Inc.  
Case No. 1:24-cv-08337-JLR  
Request to Adjourn Initial Conference**

Dear Judge Rochon,

We represent Plaintiff, Tavon Turner, in the above-referenced matter, brought pursuant to the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12101 et seq. Please accept this correspondence in response to your Honor’s January 23, 2025 Order.

We write with the consent of defense counsel to advise the Court that the parties have been engaged in substantial settlement discussions and believe that a settlement in this matter is likely. The parties respectfully request a stay of all proceedings in this matter for an additional thirty days to allow the parties to continue settlement discussions.

Thank you for your understanding and consideration.

Sincerely,

JOSEPH & NORINSBERG, LLC



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